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individually and on behalf of all similarly
situated.

Plaintiffs,

26 | VS.

27 | GOOGLE LLC.

28 || Defendant.

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Case No.: 4:20-cv-03664-VGB-SVK

**SECOND DECLARATION OF MARK C.
MAO IN SUPPORT OF PLAINTIFFS'
REQUEST FOR REMIMBURSEMENT
OF ATTORNEYS' FEES AND COSTS
INCURRED FOR SUCCESSFUL
SANCTIONS MOTION**

The Honorable Susan van Keulen

DECLARATION OF MARK C. MAO

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration pursuant to the Court's Order requesting additional information about the attorneys' fees incurred by Plaintiffs for their successful motion for sanctions for discovery misconduct (Dkt. 603).

3. In preparing this submission, Plaintiffs realized that their prior submission (Dkt. 597) incorporated certain time entries associated with travel for the April 21, 2022 evidentiary hearing. Plaintiffs do not seek reimbursement for attorney travel time, so those entries are being removed. Instead of \$992,172 in attorneys' fees, Plaintiffs now seek \$981,947 in attorneys' fees. In addition, as before, Plaintiffs seek \$28,892 in experts' fees and \$57,860.43 in costs—with Plaintiffs now seeking a total of \$1,068,699.43.

4. The \$981,947.00 in attorneys' fees were incurred as follows:

Task	Hours	Total
(1) Drafting all documents filed with the Court (including review of Google's opposition to the motion for sanctions)	405.9	\$305,930.50
(2) Hearing Preparation and Participation	674.8	\$622,396.50
(3) Reviewing Google document productions	72.6	\$53,620
Total	1153.30	\$981,947.00

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of June, 2022, at San Francisco, California.

/s/ *Mark Mao*